142772 029

MALCOLM PIRNIE

INTER-OFFICE CORRESPONDENCE

To: J.C. Henningson

Date: 8/5/82

From: R. P. Brownell

66

Subject: Waukegan Harbor

1. The following alternatives have been evaluated:

   a. North Ditch/Upland
      1. No action
      2. Stabilization
      3A. Stabilize + Limited removal of hot material (say 13,500 cy); dispose in b.2a. or b.6 below.
      3B. Stabilize + Limited removal to b3 below.
      4. On site encapsulation to 50 ppm. (See B4)
      5. Off site encapsulation to 50 ppm. (See B5)

   b. Harbor

      1. No action
      2A. Fill slip 3 with hot sand from a 3 above + dredge silted area from upper B-1 + dredge about 20,000 cy from Upper Harbor
      2B. Fill slip 3 with upper B-1 + rest of Upper Harbor
      3A. Dredge slip 3 + Upper B-1 and place hot sand (See a3 above) from No. ditch and encapsulate in vacant lot.
      3B. 3A + 20,000 cy more from Upper Harbor
      3C. Dredge slip 3 + Upper Harbor + hot sand
      3D. Dredge slip 3 + upper B-1 and encapsulate in vacant lot.
      4. Dredge slip 3 and Upper Harbor and encapsulate in parking lot (See A4)
      5. Off site encapsulation to 50 ppm (See A5)
      6. Remove any dewatered material from a.3A and 3D and incinerate. Dispose of ash offsite.

2. Considering the economic impacts which lack of dredging in the slip 3 and Upper Harbor area could have on Larsen Marine, the costly requirements associated with the disposal of material containing PCB's, the possibility of hydraulic or other natural events moving PCB laden materials in an unsecured fashion into the environment, the possibility of man made events moving PCB laden materials in an unsecured fashion into the environment, I feel that the no action options have virtually no merit and will be considered no further.

Also removing highly contaminated material from slip 3 and the North Ditch/Upland area and incinerating the material has serious problems (e.g., double and tripple handling, lengthy operation period, potential loss of PCB during extensive handling, storage and burning, use of 50 to 60 gallons of fuel oil per cubic yard of material burned) which limits its feasibility. Hence it too will be considered no further.

RPB:vm